

Complaint.

SIXTH: That Defendant, Lawson Downey, is the owner of record of the parcel of land designated as Lot No. 9, in Block No. 21, as shown on the aforementioned Plat, pursuant to Map 12 of the Tax Maps of the Town of Brunswick, Frederick County, Maryland. That said tax maps do not provide a deed reference, however. Further, the State Assessment office for Frederick County does not have an address for said individual and has not collected any recent real property taxes thereon except for the taxes on the improvements paid by Plaintiffs; and a diligent search of the Land Records of Frederick County, Maryland, has failed to reveal a deed unto said Lawson Downey.

SEVENTH: That the Defendants, Ching-Tai B. Kao and Kung Y. Tao Kao, are the owners of the Parcel of land designated as Lot No. 8, in Block No. 21, as shown on the aforementioned Plat, pursuant to Map 12 of the Tax Maps of the Town of Brunswick, Frederick County, Maryland.

EIGHTH: That no actions at law or equity are pending in any court with respect to the land that is the subject of this proceeding, and that the Plaintiff is entitled to a judgment declaring them to be the holder of good and marketable title in fee simple to the aforesaid Lots No. 8 and 9, in Block No. 21, as shown on the aforementioned Plat.

NINTH: That other than title search and identification of persons who may have claims to the subject property as disclosed thereby, Plaintiff has no other method of determining the